

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

JOSE DANIEL ORELLANA  
JUAREZ,

Petitioner,

v.

ANTONE MONIZ, Superintendent, Plymouth  
County Correctional Facility  
PATRICIA HYDE, Field Office Director,  
TODD LYONS, Acting Director U.S.  
Immigrations and Customs Enforcement,  
and KRISTI NOEM, U.S. Secretary  
of Homeland Security,

Respondents.

C.A. No. 25-11266-MJJ

**DECLARATION JOSE DANIEL ORELLANA JUAREZ**

I, Jose Daniel Orellana Juarez, hereby declare under penalty of perjury that the following statements are based on my personal knowledge and are true and correct to the best of my knowledge:

1. My name is Jose Daniel Orellana Juarez.
2. I was born in Guatemala in the year 2000.
3. I reside in Framingham, Massachusetts.
4. I am currently being detained at Plymouth County Correctional Facility.
5. I entered the United States in August 2022.
6. When I first arrived, I lived in Massachusetts for seven months and then I moved to Georgia, where I lived for seven months. In November 2023, I returned to Massachusetts and have lived here ever since. I have not left the United States since my arrival in August 2022.
7. I currently live with my family, whom I help in various ways. I pay the majority of our rent and car insurance, drive them to medical appointments when needed, purchase groceries, and help around the house. I take night classes to learn English. I also attend church regularly.



8. On May 5, 2025, I left home at about 6:40 a.m. to drive to work. Three vehicles, which I understand were part of U.S. Immigration and Customs Enforcement ("ICE"), cornered me at a traffic light near a gas station in Framingham, Massachusetts. An officer asked for my ID, and I gave him my Massachusetts Driver's License. The officer went back to his car and returned after a short time. Another officer said to the first officer, "He does not have a criminal record." The first officer responded, "It doesn't matter; let's arrest him." He then asked me to step out of my car, handcuffed me, and put me into his car. He then showed me a picture of a person who lives in an apartment adjacent to mine and asked if I knew him. I said that I did not. Eventually, I was transferred to a van, where I was held with others for 10 hours without food and only permitted to use the restroom once. I continually asked why I was being detained, especially because I have no criminal record. I received no explanation and was told that I would find out when I arrived at the agency.
9. Finally, I was taken to Burlington and placed in a cell with others. I was given an expedited order of removal and told to sign it. I asked to speak with a lawyer and was told that I could not have a lawyer because I was being immediately deported. I refused to sign the document. This took place on May 5, 2025.
10. Prior to be given the order of Expedited Removal, I was not given any chance to gather evidence, to present evidence, or to engage or consult with an attorney.
11. Prior to being given the order of Expedited Removal, ICE never asked me how long I have been in the United States.
12. Since being arrested by ICE, I have never been brought to Immigration Court or had a hearing before an Immigration Judge. I have not received bond hearing or other hearing in the Immigration Court to decide if I should be detained.
13. On May 6, 2025, around 3:15 a.m., I was transferred to Plymouth County Correctional Facility, where I am currently being detained.
14. After arriving at Plymouth, I immediately began working to engage an attorney to represent me in my immigration case. On May 7, 2025 I engaged attorney Mara J. Weisman, Esq. as my immigration attorney.
15. I am afraid to be deported to Guatemala because I was already persecuted by gang members while I lived there, who threatened to kill me multiple times and tried to abduct me. I believe that these gang members will find and kill me if I return to Guatemala because gangs are very powerful and well-connected there. Once a person is targeted by a gang, it does not matter how much time has passed or to which part of the country they might return; the gang will find and kill them. Further, I know that the police will not protect me because my family and I filed many police reports while we lived there, and

our persecution only increased after filing these reports. I would like the opportunity to pursue relief from removal here in the United States.

16. If released from custody, I will attend all required court appearances and abide by any and all conditions of release.
17. Because I am detained, my attorney Mara J. Weisman and translator read this declaration to me over the phone, and I have authorized attorney Weisman to affix my signature to this declaration.

WGUW for Jose Daniel Orellana Juarez

Jose Daniel Orellana Juarez  
Signed by direction

5/9/2025

Date

I, Rosemarie Thornton, hereby certify that I have read each and every word of this declaration to the affiant in Spanish. I am competent in Spanish and English to interpret between the two languages, and I certify that the oral interpretation was true and accurate to the best of my abilities.

Rosemarie Thornton

Phone Interpreter

5/9/2025

Date